

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) No. 3:24-cr-00217
PHILIP TAYLOR SOBASH,) JUDGE TRAUGER
Defendant.)

**UNOPPOSED MOTION TO CONTINUE TRIAL AND TO EXTEND PRETRIAL
DEADLINES**

Comes now the Defendant, Philip Taylor Sobash, by and through undersigned counsel, and hereby moves this Honorable Court to continue the trial of this case, currently set for March 25, 2025, and to extend the related pretrial deadlines for a continuance of up to 300 days. In support of this motion the defendant would show:

1. Trial in this matter is currently scheduled to commence on March 25, 2025, at 9:00 a.m. (DE 15).
2. The pretrial motion deadline is currently 28 days from the date of Mr. Sobash's arraignment in this matter, which was held on January 17, 2025 (DE 10, 15).
3. Undersigned counsel has been retained by Mr. Sobash as his legal representation in this instant matter.
4. Counsel has not yet received any of the discovery in this matter. Counsel and the U.S. Attorney's office have been in communication to resolve some issues concerning attorney-client privileged materials in order for the discovery to be processed and disseminated to the defense team.

5. A continuance is necessary to allow counsel and Mr. Sobash to complete a comprehensive review of the discovery, to conduct a thorough and independent investigation of the charges, and to consult regarding the serious legal issues in this matter.
6. A continuance is necessary in order for counsel to provide effective assistance and prepare an effective defense for Mr. Sobash in any plea negotiations or pre-trial litigation.
7. Undersigned has sent Mr. Sobash a waiver of speedy trial and expects to have the waiver returned to her office and filed with the Court next week.
8. The waiver of speedy trial states a consent to a continuance of up to 300 days out of an abundance of caution, as the parties were waiting confirmation regarding the Court's November 2025 trial availability.
9. AUSA Monica Morrison and DOJ Attorney Adam Braskich agree that a continuance is necessary and are unopposed to the filing of this motion.
10. The parties have consulted with the Court's courtroom deputy and have agreed to a new trial date of November 18, 2025.

WHEREFORE, based on the foregoing, Defendant Philip Taylor Sobash respectfully requests this Honorable Court enter an Order continuing the trial and resetting the pretrial deadlines in this matter.

Respectfully Submitted,

/s/Jennifer Lynn Thompson
Jennifer Lynn Thompson
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been forwarded electronically via CMECF to the following individuals:

Monica Morrison
Assistant United States Attorney
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Adam Braskich
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On this 14th day of February 2025.

/s/ Jennifer Lynn Thompson
Jennifer Lynn Thompson